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5 | Counsel for Dell Financial Services, LLC
(erroneously named as WebBank)

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDREI GRUIA, an individual,
Plaintiff,

Case No.: 2-18-cv-02107-JCM-CWH

v.
12 EQUIFAX INFORMATION SERVICES,
13 LLC, a foreign limited liability company;
14 EXPERIAN INFORMATION
15 SOLUTIONS, INC., a foreign corporation;
16 TRANS UNION, LLC, a foreign limited
17 liability company; BARCLAYS BANK
18 DELAWARE, a foreign corporation;
19 BERLIN-WHEELER, INC., a foreign
20 corporation; CAPITAL ONE BANK (USA),
N.A., a national banking association;
CHASE BANK USA, N.A., a national
banking institution; CITIBANK, N.A., a
national banking institution;
CONVERGENT OUTSOURCING, INC.,
a foreign corporation; DISCOVER BANK, a
foreign corporation; GRANT & WEBER,
INC., a domestic corporation; NRA
GROUP, LLC dba NATIONAL
RECOVERY AGENCY, a foreign limited
liability company; ONEMAIN FINANCIAL
SERVICES, INC., a foreign corporation;
SYNCHRONY BANK, a foreign
corporation; VERIZON WIRELESS
SERVICES, LLC, a foreign limited liability
company; WEBBANK, a foreign
corporation; WELLS FARGO BANK, N.A.,
a national banking association;

**STIPULATION AND ORDER TO
EXTEND TIME FOR DELL FINANCIAL
SERVICES, LLC (ERRONEOUSLY
NAMED AS WEBBANK) TO RESPOND
TO PLAINTIFF'S COMPLAINT**

|| (SECOND REQUEST)

Defendants.

1 Plaintiff Andrei Gruia (“Plaintiff”) and Defendant Dell Financial Services, LLC (erroneously
2 named as “WebBank”) (“Dell”) hereby stipulate and agree that Dell has up to and including March
3 8, 2019 to respond to Plaintiff’s Complaint (ECF No. 1). This will provide Dell additional time
4 needed to investigate Plaintiff’s allegations, to evaluate potential early settlement, and, if needed, to
5 prepare a response.

6 This is the second request for such an extension. The first request and Court order extended
7 the time for Dell to respond to February 22, 2019. This stipulation is made in good faith and is not
8 intended to cause any delay or prejudice any party.

9 **IT IS SO STIPULATED.**

10 DATED this 22nd day of February, 2019.

11 **TAKOS LAW GROUP, LTD.**

12 _____
13 /s/ *Zachary P. Takos*
14 Zachary P. Takos, Esq., NV Bar No. 11293
1980 Festival Plaza Drive, Suite 300
Las Vegas, Nevada 89135

15 Counsel for Dell Financial Services, LLC
(erroneously named as WebBank)

DATED this 22nd day of February, 2019.

LAW OFFICE OF KEVIN L. HERNANDEZ

12 _____
13 /s/ *Kevin L. Hernandez*
14 Kevin L. Hernandez, Esq., NV Bar No. 12594
8872 S. Eastern Avenue, Suite 270
Las Vegas, NV 89123

15 Counsel for Plaintiff Andrei Gruia

18 **IT IS SO ORDERED.**

19 _____
20 *C. H. Hernandez*
21 UNITED STATES MAGISTRATE JUDGE
22 DATE: February 26, 2019
23 _____
24 _____
25 _____
26 _____
27 _____
28 _____